

# Memorandum

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**To:** Stephanie Carr, US EPA

**From:** Robert J. Drake, PE, Ph.D., LEP

**Date:** December 18, 2006

**Subject:** Estimated Schedule to Complete RCRA Corrective Action Activities, former IntelliData facility, New Milford, CT

cc: Kevin King, LEP

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As requested by the United States Environmental Protection Agency (US EPA) in correspondence dated July 27, 2006, ERM has prepared this schedule for the performance and anticipated completion dates of RCRA Corrective Action (CA) activities at the former IntelliData site.

Specific CA items to be addressed are:

- Demonstration of Migration of Contaminated Groundwater Under Control;
- Demonstration of equivalence of "clean closure" for the former RCRA disposal units (lagoon, sludge drying beds, and associated piping; and
- Demonstration of compliance of the other identified solid waste management units/ identified "Areas of Concern" (AOCs).

## Demonstration of Compliance

As agreed to with US EPA, success for each of these issues will be determined as follows:

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Demonstration of Migration of Contaminated Groundwater Under Control is to be defined using groundwater data collected from on-site monitoring well *ERM-11* and the bedrock groundwater evaluation. Demonstration of Control for overburden groundwater will be satisfied after the first quarterly groundwater monitoring event where all parameters are below appropriate RSR criteria [residential volatilization (RVC) and surface water protection criteria (SWPC)].



Demonstration of Control for bedrock groundwater will be satisfied if:

- Preliminary on-site bedrock geophysical evaluation indicates an absence of transport of VOCs in fractured or weathered formations; or
- If such transport is found, then the off-site (riverbank) investigation confirms the Conceptual Site Model of bedrock groundwater transport (i.e., Housatonic River is the ultimate discharge source).

Demonstration of "equivalence of clean closure" of the former RCRA units will be satisfied following eight (8) consecutive quarters of groundwater monitoring of these units, providing no assayed parameters exceed either RVC or SWPC.

Demonstration of compliance with the other AOCs will be assumed following eight (8) successive quarters of groundwater monitoring of these units, providing no assayed parameters exceed either RVC or SWPC.

### **Schedule for Compliance**

The following schedule is proposed for the RCRA CA efforts described above.

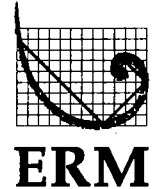
#### *Demonstration of Migration of Contaminated Groundwater Under Control*

This demonstration for overburden groundwater is subject to the effectiveness of the existing remediation system, which has been operational for only ten (10) months. The primary parameter driving the compliance issue is trichloroethylene (TCE), which is the only parameter present above the critical RSR criteria, the RVC. With only three (3) quarters of

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groundwater data available, the projection of a date for compliance based on this limited data may be problematic. However, based on the limited data trends for *ERM-11*, it appears that the Demonstration of Contaminated Groundwater Under Control can be made in the summer of 2007.



It should be noted that this Demonstration does not mean that the remedial program will necessarily be complete. It will indicate that, with the remediation system in operation, there is no contaminated groundwater leaving the Site in overburden groundwater at concentrations above appropriate regulatory standards.

The demonstration for bedrock groundwater will be satisfied following the receipt of geophysical results from the on-site bedrock wells which indicate the absence of VOC transport or, if such transport is indicated, where the discharge location of the bedrock plume is located. The former effort is anticipated before the end of January, 2007, with the latter effort (if necessary) anticipated to be complete by late spring 2007.

#### *Demonstration of Clean Closure Equivalence of Former RCRA Units*

Initiation of quarterly groundwater monitoring for the RCRA units will commence in January 2007. Assuming no parameters are detected above appropriate RSR criteria (RVC, SWPC), demonstration of equivalence will be made in October 2008, after the final (of eight) quarterly sampling events.

#### *Demonstration of Compliance for Other AOCs*

Initiation of quarterly groundwater monitoring for the other AOCs will commence in January 2007. Assuming no parameters are detected above appropriate RSR criteria (RVC, SWPC), demonstration of compliance will be made in October 2008, after the final (of eight) quarterly sampling events.

#### **Schedule Summary**

The table below presents a schedule for compliance with EPA's CA concerns and provides anticipated completion dates:

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**RCRA Corrective Action Schedule**

<b>Issue</b>	<b>Anticipated Completion Date</b>
Groundwater Migration (Overburden)	August 2007
Groundwater Migration (Bedrock)	May 2007
RCRA Unit Clean Closure	October 2008
Remaining AOC Closure	October 2008

